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**FILED VIA ECFS**

Thomas J. Beers, Chief  
Policy and Licensing Division  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
Washington, DC 20554

**RE: NATCO Video, LLC**  
**Petition for Extension of Waiver of Common Alerting Protocol**  
**Compliance Obligations (filed June 11, 2013)**  
**EB Docket No. 04-296**

Dear Mr. Beers:

On June 11, 2013, NATCO Video, LLC (“NATCO”) requested an extension of the waiver of the Section 11.56(a) Common Alerting Protocol (“CAP”) compliance deadline for the small analog cable television system (Physical System Identification Number 009749) that it had recently purchased from Yelcot Video Group, Inc. (“Yelcot”)<sup>1</sup> and that served the community of Diamond City, Arkansas (Community Unit Identification Number AR0360), plus a small portion of the community of Lead Hill, Arkansas (Community Unit Identification Number AR0361).

NATCO indicated that it had purchased the small and outmoded Diamond City-Lead Hill analog cable system primarily to gain some video service experience before embarking upon a much larger project to deploy digital Internet Protocol television service in Diamond City and Lead Hill and other portions of the service area of its parent Northern Arkansas Telephone Company, Inc. NATCO indicated that its parent company was upgrading its Diamond City local exchange telephone network to a predominately fiber optic network pursuant to a grant-loan from the Broadband Initiatives Program (“BIP”) of the Rural Utilities Service (“RUS”). Once the fiber distribution network was completed, NATCO indicated that it would move forward to scrap the outmoded analog Diamond City-Lead Hill cable headend and replace it with a digital Internet Protocol (“IP”) video platform

<sup>1</sup> Yelcot had previously purchased a small cable television company that owned and operated several systems in or near Yelcot’s local exchange telephone service area. The Diamond City-Lead Hill cable system appears to have been an extraneous part of that package that did not fit in well with the rest of Yelcot’s operations.

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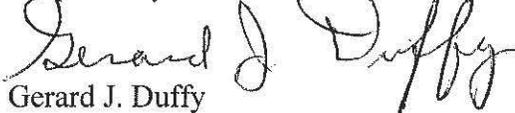
that would be CAP-compliant as well as offering significantly expanded and higher quality video service. NATCO estimated at the time of the June 2013 filing that the new video platform would be deployed, and the old headend taken out of service, by the end of 2014.

NATCO reports that its June 2013 estimate is still relatively on target. As of early April 2014, NATCO estimates that its new digital IP video platform should be installed and operational (and its existing analog Diamond City-Lead Hill headend removed from service) as early as mid-September 2014, or as late as mid-February 2015. These estimates are contingent upon circumstances such as the absence of harsh and disruptive weather (*e.g.*, the tornados and ice storms that occasionally cause significant destruction across northern Arkansas), the timely delivery of the remaining digital IP video platform equipment and associated facilities, and the finalization of the negotiation of certain critical video programming agreements.

Given that NATCO will be replacing its outmoded analog headend with a CAP-compliant digital IP video platform within the next five-to-ten months, it makes no sense to require NATCO to purchase and install CAP capabilities for a facility that will soon be scrapped. NATCO's cable customers and the other residents of the Diamond City and Lead Hill areas will continue to receive public safety alerts from the local warning systems, from the Springfield, Missouri market television systems carried on NATCO's cable system and available off-the-air to households with sufficient rooftop antennas, and from the approximately nineteen nearby AM and FM radio stations. Finally, NATCO notes that, if it had not purchased and operated the Diamond City-Lead Hill cable system during the interim while it was constructing its fiber optic network and digital IP video platform, the system possibly could have reduced service or gone dark because Yelcot's resources and long-term plans reasonably appear focused upon areas other than the Diamond City-Lead Hill area.

In light of the above, NATCO renews and reiterates its request for an extension of the waivers of the Section 11.56(a) CAP compliance deadline for the subject small analog cable television system serving Diamond City and a portion of Lead Hill, Arkansas.

Respectfully submitted,



Gerard J. Duffy  
Counsel for NATCO Video, LLC